

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEVE SEGAL, NICK HAMMER, ROBIN
HOUGDAHL, and TODD TERRY, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

RAYMOND BITAR; NELSON BURTNICK;
FULL TILT POKER, LTD.; TILTWARE, LLC;
VANTAGE, LTD; FILCO, LTD.; KOLYMA CORP.
A.V.V.; POCKET KINGS LTD.;
POCKET KINGS CONSULTING LTD.;
RANSTON LTD.; MAIL MEDIA LTD.;
HOWARD LEDERER; PHILLIP IVEY JR.;
CHRISTOPHER FERGUSON; JOHNSON
JUANDA; JENNIFER HARMAN-TRANIELLO;
PHILLIP GORDON; ERICK LINDGREN; ERIK
SEIDEL; ANDREW BLOCH; MIKE MATUSOW;
GUS HANSEN; ALLEN CUNNINGHAM; PATRIK
ANTONIUS and JOHN DOES 1-100,

Defendants.

Case No.: 11-cv-4521

I, **THOMAS H. BURT**, Esq., hereby declare under penalty of perjury that the following
is true and correct to the best of my knowledge:

1. I am a member of the law firm of Wolf Haldenstein Adler Freeman & Herz LLP,
and am admitted to practice before this Court. I have personal knowledge of the facts stated
below.

2. This firm is counsel to Steve Segal, Nick Hammer, Robin Hougdaahl, and Todd
Terry ("Plaintiffs"). I submit this Declaration to supplement the information in Plaintiffs'
Opposition to Defendants' Motion to Dismiss and the Declaration of Thomas H. Burt filed on
September 16, 2011, pertaining specifically to Defendant Johnson Juanda ("Juanda").

Defendant Johnson Juanda Directly Gambled with New Yorkers Through the Full Tilt Site

3. Plaintiffs' independent research has revealed specific instances in which Defendant Juanda participated in Full Tilt online poker rooms (all hosted on www.fulltiltpoker.com) with New York residents.

4. Team Full Tilt pro player and Defendant Juanda has played hands of online poker against New Yorkers on numerous occasions.

5. Defendant Juanda played hands of online poker against New Yorker Phil Galfond (who used the Full Tilt username "OMGClayAiken") on September 11, October 10, October 30, October 31 and December 28, 2008.

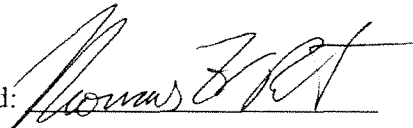
6. Defendant Juanda played hands of online poker against New Yorker Jason Rosenkrantz (who used the Full Tilt username "pr1nnnyraid") on November 18, 2008.

7. Defendant Juanda played hands of online poker against New Yorker Emil Patel (who used the Full Tilt username "whitelime") on June 1, July 23 and October 13, 2008.

8. Defendant Juanda played hands of online poker against New Yorker Ariel Schneller (who used the Full Tilt username "DaEvils") on June 27, July 16, July 27, July 28 and August 3, 2008.

9. Defendant Juanda played hands of online poker against New Yorker Daniel Stern (who used the Full Tilt username "ansky451") on July 1 and July 22, 2008.

Dated: October 7, 2011

Signed: 

670033